

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Lake Communications)	
Assignor)	WC Docket No. _____
)	
Contel Systems, Inc.)	
Assignee)	
)	
For Assignment of the Assets of Lake Communications, which)	
provides resold interstate interexchange services in Minnesota)	
pursuant to a blanket domestic Section 214 authorization)	

TO: Wireline Competition Bureau

**APPLICATION FOR STREAMLINED ASSIGNMENT
OF DOMESTIC BLANKET SECTION 214 AUTHORIZATION**

Lake Communications ("LCI"; FRN: 0021-4824-92) and Contel Systems, Inc. ("CSI"; FRN: 0008-2400-95) hereby request Commission authorization for the assignment to CSI of the Domestic Section 214 authorization, customer lists and accounts, and other tangible and intangible assets of LCI used to resell interstate interexchange long distance toll services in rural portions of Lake County, Minnesota and eastern St. Louis County, Minnesota, and the continuing provision of these resold long distance toll services by CSI pursuant to the assigned domestic Section 214 authorization.

LCI is a Minnesota corporation that has been reselling local exchange service and long distance toll service within rural portions of Lake County, Minnesota and eastern St. Louis County, Minnesota that are served by a broadband network that is owned by the government of Lake County, Minnesota. LCI competes in those areas with the incumbent local exchange carrier ("ILEC") operations of CenturyLink and Frontier Communications Corporation, their associated

long distance toll services, other long distance toll service providers, Voice over Internet Protocol (VoIP) services, and wireless voice services.

CSI is a Minnesota corporation and wholly-owned subsidiary of Consolidated Telephone Company ("CTC"), a Minnesota cooperative. CSI has been in existence since February 28, 1983. CSI has pending an application to complete its operational authority before the Minnesota Public Utilities Commission to provide resold local exchange services and intrastate interexchange services within certain areas of Minnesota, including the portions of Lake County and eastern St. Louis County areas that are the subject of this application. When it commences its planned resale operations, CSI will operate under the assumed business name "Consolidated Telecommunications Company" as filed with the Minnesota Secretary of State.

The proposed transaction qualifies for streamlined processing pursuant to Section 63.03(b)(1)(i) of the Commission's Rules because both applicants are non-facilities-based carriers.

In accordance with the requirements of Section 63.04(a) of the Commission's Rules, the Applicants submit the following information:

(1) Name, address and telephone number of each applicant:

Assignor:

Lake Communications
P.O. Box 517
Two Harbors, MN 55616
Telephone: (218) 834-9444

Assignee:

Contel Systems, Inc.
1102 Madison Street (P.O. Box 972)
Brainerd, Minnesota 56401
Telephone: (218) 764-5211
Facsimile: (218) 829-5146

(2) Government, state or territory under the laws of which each corporate or partnership applicant is organized:

LCI is a Minnesota corporation.

CSI is a Minnesota corporation.

CTC is a Minnesota cooperative.

(3) Name, title, post office address, and telephone number of the officer or contact person to whom correspondence concerning the application is to be addressed:

For Assignor:

Jeffrey Roiland, President
Lake Communications
P.O. Box 517
Two Harbors, MN 55616
Telephone: (218) 834-9444

For Assignee:

Kristi K. Westbrook, COO
Contel Systems, Inc.
1102 Madison Street (P.O. Box 972)
Brainerd, Minnesota 56401
Telephone: (218) 764-5211
Facsimile: (218) 829-5146

With a copy to Counsel:

Gerard J. Duffy
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street, N.W. (Suite 300)
Washington, D.C. 20037
Telephone: (202) 659-0830
Facsimile: (202) 828-5568

- (4) **Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:**

Lake Communications (Assignor)

The names, addresses, citizenship and principal businesses of the entities that own at least ten (10) percent of the equity and voting power of Lake Communications both before and after the proposed transaction are:

<u>Name & Address</u>	<u>% Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Jeffrey Roiland P.O. Box 517 Two Harbors, MN 55616	50.00%	U.S.A.	Telecommunications
Robert Thompson P.O. Box 517 Two Harbors, MN 55616	50.00%	U.S.A.	Telecommunications

No other individual or entity directly or indirectly owns an interest of ten (10) percent or more of the equity and voting power of Lake Communications before or after the proposed transaction.

Contel Systems, Inc. (Assignee)

The name, address, citizenship and principal business of the sole entity that owns at least ten percent (10.0%) of the equity and voting power of Contel Systems, Inc. both before and after completion of the proposed transaction are:

<u>Name & Address</u>	<u>% Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Consolidated Telephone Company 1102 Madison Street Brainerd, MN 56401	100.00%	MN Cooperative	Telecommunications

In turn, Consolidated Telephone Company is a cooperative that has approximately 11,600 member-owners, none of whom directly or indirectly owns or controls ten percent (10.00%) or more of the equity or voting power of the cooperative. All of the directors, officers and key management officials of Consolidated Telephone Company are United States citizens. To the best of the Cooperative's information and belief, all of its member-owners are United States citizens.

No other individual or entity will directly or indirectly own or control an interest of ten (10) percent of the equity and/or voting power of CSI before or after the proposed transaction.

(5) Certification pursuant to 47 C.F.R. §§1.2001 through 1.2003 that no party to the application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

LCI and CSI hereby certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(6) Description of the transaction:

The proposed transaction is a sale by LCI to CSI of LCI's blanket Domestic Section 214 authorization, customer lists and accounts, and other tangible and intangible assets of LCI used to resell interstate interexchange long distance toll services in rural area encompassing Lake County and eastern St. Louis County, Minnesota. CSI will use the assets acquired from LCI, and enter into agreements with Lake County, Minnesota (which owns a fiber-optic broadband network serving the Lake County and eastern St. Louis County area where CSI will resell local exchange and long distance toll services) and with other telecommunications carriers and service providers (to obtain other necessary facilities and services) in order to continue providing resold long distance toll services to Lake County and eastern St. Louis County residents pursuant to the subject domestic Section 214 authorization acquired from LCI.

(7) Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:

Areas and Services of Lake Communications and Affiliates

LCI has been a reseller of local exchange services and long distance toll services within Lake County and eastern St. Louis County, Minnesota in rural north eastern Minnesota. LCI also offers optional voice service features such as voice mail, unified call messaging, anonymous call rejection, national toll blocking, do not disturb service, speed dialing, selective call rejection, reminder calls, and follow-me service.

LCI and its owners have no other subsidiaries or affiliates that offer telecommunications services.

Areas and Services of Contel Systems, Inc. and Affiliates

CSI presently has no active telecommunications operations or interests.

Consolidated Telephone Company ("CTC"), the parent company of CSI, is a Minnesota cooperative and ILEC/CLEC that provides local exchange services to fifteen exchanges

(Sullivan Lake, Randall, Pillager, Outing, Nokay Lake, Nisswa, Motley, Mission, Lincoln, Leader, Freedhem, Little Falls, Brainerd, Staples and Aitkin) in Cass, Crow Wing, Todd, Aitkin, Wadena and Morrison Counties in rural central Minnesota. CTC offers a variety of optional voice service features such as voice mail, caller ID with Screen Pop, call forwarding and call waiting. CTC also provides other services such as Internet access, digital television and smart home monitoring within its local exchange service area.

CTC owns a 100 percent equity interest in CI Communications, Inc., a Minnesota corporation that provides local exchange telecommunications services in the Crosby exchange in Crow Wing County in rural central Minnesota.

CTC holds a 20 percent equity interest in Central Transport Group, LLC, a Minnesota limited liability company that provides middle mile and other transport services to telecommunications carriers in the State of Minnesota.

CTC holds a 5 percent equity interest in Cooperative Network Services, LLC, a Minnesota limited liability company that provides middle mile and other transport services to telecommunications carriers in the State of Minnesota.

CTC and CSI have no other subsidiaries or affiliates that offer telecommunications services.

(8) Statement as to how the application fits into one or more of the presumptive streamlined categories in section 63.03 or why it is otherwise appropriate for streamlined treatment:

This application qualifies for streamlined processing pursuant to Section 63.03(b)(1)(i) of the Commission's Rules because both applicants are non-facilities-based carriers.

(9) Identification of all other Commission applications related to the same transaction:

LCI holds an International Section 214 Authorization for Global Resale (File No. ITC-214-20120313-00072, granted March 30, 2012). CTC also holds an International Section 214 Authorization for Global Resale (File No. ITC-214-20080509-00245, granted June 20, 2008). It has been determined that CSI will use CTC and its International Section 214 Authorization to resell international toll service to the CSI customers that may occasionally make international toll calls. Therefore, LCI will be cancelling its International Section 214 Authorization prior to the closing of the transaction.

(10) Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:

No party to the transaction is facing imminent business failure at this time. Therefore, the Applicants are not requesting special consideration because a party to the transaction is facing imminent business failure.

(11) Identification of any separately filed waiver requests being sought in conjunction with the transaction:

No separately filed waivers or waiver requests are being sought in conjunction with the proposed transaction.

(12) Statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:

The proposed transaction entails the acquisition of all of the LCI assets used to provide resold local exchange service and long distance toll service in Lake County and eastern St. Louis County, Minnesota by CSI, a subsidiary of the CTC. CTC has long operated telecommunications networks in the same state of Minnesota. CTC has a long and proven record of investing in rural networks and communities, and of providing high-quality, state-of-the-art voice, data and video services at affordable rates to its rural service areas. The proposed transaction will ensure that the rural Minnesota customers of LCI will continue to receive quality competitive local exchange services and long distance toll services at affordable rates during the foreseeable future.

Conclusion

In light of the foregoing facts and public interest considerations, the Commission is respectfully requested to authorize the assignment to Contel Systems, Inc. of the Domestic Section 214 authorization, customer lists and accounts, and other tangible and intangible assets of Lake Communications that are used to resell interstate interexchange services in Lake County, Minnesota and eastern St. Louis County, Minnesota, and the continuing provision of these resold long distance toll services by Contel Systems, Inc. pursuant to the assigned domestic Section 214 authorization.

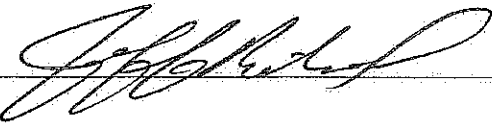
Lake Communications and Contel Systems, Inc. reiterate that they certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

LAKE COMMUNICATIONS

CONTEL SYSTEMS, INC.

By: _____



By: _____

Printed Name: Jeff Roiland

Printed Name: _____

Title: President & CEO

Title: _____

Date: March 10, 2017

Date: _____

Conclusion

In light of the foregoing facts and public interest considerations, the Commission is respectfully requested to authorize the assignment to Contel Systems, Inc. of the Domestic Section 214 authorization, customer lists and accounts, and other tangible and intangible assets of Lake Communications that are used to resell interstate interexchange services in Lake County, Minnesota and eastern St. Louis County, Minnesota, and the continuing provision of these resold long distance toll services by Contel Systems, Inc. pursuant to the assigned domestic Section 214 authorization.

Lake Communications and Contel Systems, Inc. reiterate that they certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

LAKE COMMUNICATIONS

CONTEL SYSTEMS, INC.

By: _____

By: Kevin T. Larson

Printed Name: _____

Printed Name: Kevin T. Larson

Title: _____

Title: CEO/GM

Date: _____

Date: 3/10/17